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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

June 10, 2025

Clerk of Court
United States Bankruptcy Court
District of Delaware
824 North Market Street, 3rd Floor
Wilmington, DE 19801

June 10, 2025

Re: In re FTX Trading Ltd., Case No. 22-11068 (JTD)
Motion to Allow Late KYC Submission — Pro Se Filing

Dear Clerk:

I, Kelvin Azevedo Santos, a pro se creditor in the above-captioned case, hereby submit for filing:

1. Motion for Order Allowing Late KYC Submission and Reinstating Claim
2. Proposed Order
3. Certificate of Service

Please file-stamp two (2) copies and return one (1) stamped copy to me in the enclosed self-addressed, prepaid envelope. Thank you very much for your assistance.

Sincerely,

/s/ Kelvin Azevedo Santos
Unique Customer Code: 00204333

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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DISTRICT OF DELAWARE

In re:
FTX TRADING LTD., et al.,
Debtors.

Chapter 11
Case No. 22-11068 (JTD)
Jointly Administered

**MOTION OF KELVIN AZEVEDO SANTOS FOR ORDER ALLOWING LATE KYC
SUBMISSION AND REINSTATEMENT OF CUSTOMER CLAIM PURSUANT TO
FED. R. BANKR. P. 9006(b)(1)**

Kelvin Azevedo Santos (“Movant”), respectfully requests entry of an order permitting late submission of Know Your Customer (KYC) information and reinstating his timely filed proof of claim, and states as follows:

1. Movant timely filed a proof of claim in these proceedings associated with Unique Customer Code 00204333, with scheduled assets including approximately \$4,190 USD and additional cryptocurrency holdings (ETH, ETHW, FTT, USTC).
2. Movant received numerous communications from FTX, most with nearly identical subject lines (“In re FTX Trading Ltd., et al, Case No. 22-11068”), that failed to clearly indicate critical urgency or potential forfeiture of assets.
3. On September 23, 2023, Movant complied fully with instructions, filing the claim timely and creating an account, noting explicitly stated KYC completion was not mandatory by the claims bar date.
4. On November 27, 2024, Movant received two similarly titled emails within less than an hour, inadvertently overlooking the second email due to confusion and similarity in subject lines. The second email contained the only explicit warning about the March 1, 2025, KYC initiation deadline buried within its text.
5. Subsequent emails (January 12 and January 30, 2025) similarly failed to adequately warn of impending disallowance, further contributing to Movant’s misunderstanding about the urgency of the KYC process.
6. Movant was only made clearly aware of the disallowance of his claim in May 2025, and immediately contacted FTX Support to rectify the issue.
7. The delay in commencing the KYC process was due to excusable neglect, primarily arising from unclear and inadequate communications rather than bad faith or deliberate delay.

8. Allowing the late KYC submission will not prejudice other creditors or materially impact the administration of the Debtors' estate.

WHEREFORE, Movant respectfully requests this Court:

- (i) Permit Movant to submit KYC information despite the missed deadline,
- (ii) Reinstate Movant's customer claim and deem it valid upon KYC completion,
- (iii) Grant such further relief as the Court deems just and proper.

Dated: June 10, 2025
Respectfully submitted,

A handwritten signature in dark ink that reads "Kelvin A. Santos". The signature is written in a cursive, flowing style.

/s/ Kelvin Azevedo Santos
Kelvin Azevedo Santos
11318 Westbrook Mill Lane #304
Fairfax, VA 22030-5665
USA
Phone: +1 (628) 268-7151
Email: azsantosk@gmail.com
Unique Customer Code: 00204333
Pro Se Movant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:
FTX TRADING LTD., et al.,
Debtors.

Chapter 11
Case No. 22-11068 (JTD)
Jointly Administered

**ORDER ALLOWING LATE KYC SUBMISSION AND REINSTATING CUSTOMER
CLAIM OF KELVIN AZEVEDO SANTOS**

Upon the Motion of Kelvin Azevedo Santos (the “Movant”) pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1) requesting permission for the late submission of Know Your Customer (KYC) information and reinstatement of his timely filed proof of claim (the “Motion”); and the Court having reviewed the Motion and any opposition thereto; and sufficient cause appearing for the relief requested;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Movant Kelvin Azevedo Santos is authorized to submit the KYC information required by the Debtors notwithstanding the previous deadline.
3. Movant’s proof of claim associated with Unique Customer Code 00204333 is reinstated and shall be deemed valid upon successful completion of the required KYC procedures.
4. The Debtors shall promptly facilitate Movant’s KYC submission and the subsequent processing of his reinstated claim in accordance with this Order.
5. The Court shall retain jurisdiction to interpret and enforce this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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FTX TRADING LTD., et al.,
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Jointly Administered

CERTIFICATE OF SERVICE

I, Kelvin Azevedo Santos, hereby certify that on June 10, 2025, I served copies of the following documents:

1. Motion of Kelvin Azevedo Santos for Order Allowing Late KYC Submission and Reinstatement of Customer Claim Pursuant to Fed. R. Bankr. P. 9006(b)(1), and
2. Proposed Order Allowing Late KYC Submission and Reinstating Customer Claim upon the following parties via email:

Debtors' Counsel: Sullivan & Cromwell LLP

Email: dietdericha@sullcrom.com, bromleyj@sullcrom.com, kranzleya@sullcrom.com, gluecksteinb@sullcrom.com

Official Committee of Unsecured Creditors: Paul Hastings LLP

Email: FTXTradingUCCInfo@epiqglobal.com

Claims Agent: Kroll Restructuring Administration

Email: ftxinfo@ra.kroll.com

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 10, 2025

Respectfully submitted,

Kelvin A. Santos

/s/ Kelvin Azevedo Santos

Kelvin Azevedo Santos

11318 Westbrook Mill Lane #304

Fairfax, VA 22030-5665

USA

Phone: +1 (628) 268-7151

Email: azsantosk@gmail.com

Unique Customer Code: 00204333

Pro Se Movant